

In response to: Minimum Standards for Community-Responsive
Programming & other Localism Issues

It is my firm belief that the FCC should set a minimum standard for community-responsive programming for broadcasters. Although broadcasters may object to such minimum standards, it is the absolute right of the FCC to set them and in my opinion they would be more effective than today's market driven environment. In a society where the levels of need for community-responsive programming may differ from state to state, the commission should seek to follow the example of the Supreme Court's 'least restrictive means' policy, so that it may appease both the masses and broadcasters. I believe this process begins by finding out what the public wants and what broadcasters are willing to offer, and then finding a middle ground. This may be effectively carried out by using our current congressional district map and surveying both citizens and broadcasters in every district within a state on what type of public affairs programming they would like to see/can offer on their local stations. The commission should create a statewide public affairs task force who will then review the suggestions by both individuals of the media and regular citizens and take a certain number of suggestions from both sides. These suggestions will then be conversely submitted to the other group (citizens to media/media to citizens) and each of these groups will be forced to agree on a few of the others suggestions. This will create a minimum standard in which both the broadcaster and the individual have a fair say in.

The commission also seeks comment on how broadcasters are currently serving the needs of their communities. At the present time stations may host a community cares program, but a trend noted by myself is that these programs will air at times of the day when general public viewership is extremely low. For example KDAF-TV in Dallas airs a public affairs show called DFW-Closeup every Sunday at 7:00 am. This is, frankly put, a ridiculous time period for a show to air that a majority of the community is 'supposed' to see. It is inconceivable to require broadcasters to air community based shows during prime-time hours, but it is not far-fetched to believe that the commission could set a window of time in which stations have to fulfill their public programming requirement within a time that public viewership will be fair. Local programming should also be identified as any programming that is locally originated and not a generic nation-wide broadcast of community needs programming through local station affiliates. The reasoning for this is that every local community has its own needs and thrives in a different atmosphere, even though we are trying to achieve a common standard, it does not make sense to apply the views and beliefs of one community to another. Broadcasters will fight this because it is cheaper for them to make one national standard of programming to fulfill the basic requirement, but it is my belief that a community based program should adopt a motto to this effect - 'by the community, for the community.' Whenever you include any event that is local in nature I believe it should fulfill a localism requirement (even high school sporting events).

At the present time the incentives inherent in market forces are not sufficient enough to encourage broadcasters to air community

responsive programming. Many industry professionals will say it is too hard to get the public to view their station when a consumer has over 100 channels to choose from if that station has to use government mandated programming. Incentive and need are two separate things. Although market forces may not provide enough incentive for broadcasters to show community responsive programming, there is still a need for such programming. It is my firm conviction that if the market is left unto itself then community responsive programming will cease to have any effect whatsoever on the public. With the evolution of the media to include satellite radio and digital technologies it will become easier to hide or bury such programming unless there is a mandate, such as a minimum requirement, by the commission requiring broadcasters to do so.

Thank you for considering my comments.